THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

ERIC C. PEARCE : CIVIL ACTION NO.:

1:05-cv-11694

Plaintiff,

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:

v. : JURY TRIAL DEMANDED

:

KEITH BAUMM,

ADVANCED COMPOSITE :

ENGINEERING D/B/A

AEGIS BICYCLES, AEGIS HANDMADE CARBON

FIBER BICYCLES, LLC dba :

AEGIS BICYCLES,

AEGIS RACING BIKES USA, LLC:

dba AEGIS BICYCLES,

FASTBIKES USA, LLC dba
AEGIS BICYCLES,

WYMAN-GORDON INVESTMENT :

CASTINGS, INC., AND :

STURM, RUGER & CO., INC

Defendants, : AUGUST 17, 2007

MOTION FOR PROPOSED SCHEDULING CONFERENCE

The undersigned plaintiff hereby moves this honorable Court to hold a Scheduling Conference in the above captioned matter. The undersigned represents that as a result of Atty. Johnson's Motion to Stay Discovery, the parties will be unable to reach an agreement on the appropriate extension of discovery deadlines, necessitating the Court's intervention via a scheduling conference. As indicated in the undersigned's July 26, 2007 Motion for Continuance of Scheduling Conference, counsel for all parties are available for this conference on September 10th in the afternoon, 12th after 3:00, and 21st.

WHEREFORE, the undersigned plaintiff hereby requests that the Court hold a scheduling conference in the above captioned matter.

Respectfully submitted:

THE PLAINTIFF, Eric C. Pearce, By his attorneys, Ouellette, Deganis & Gallagher, LLC

Sergio C. Deganis **BBO#**: 118130

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CERTIFICATION

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 17, 2007. I further certify that pursuant to local rule 7.1(a) I have contacted counsel for Keith Baumm, Wyman-Gordon, Uni-Cast and Sturm, Ruger & Co., regarding this matter and these counsel consent to the granting of this motion. I further certify that I have attempted to contact counsel for the remaining defendants, but have been unsuccessful, and therefore cannot represent to the court whether the remaining counsel object or consent to the granting of this motion.

Sergio C. Deganis

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